RENE L. VALLADARES 1 Federal Public Defender Nevada State Bar No. 11479 2 LAUREN GORMAN Assistant Federal Public Defender 3 Nevada State Bar No. 11580 201 W. Liberty Street, Ste. 102 4 Reno, Nevada 89501 (775) 321-8451/Phone 5 (775) 784-5369/Fax Lauren\_Gorman@fd.org 6 Attorney for ALEJANDRO REYES-RAMIREZ 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 UNITED STATES OF AMERICA, Case No. 3:14-cr-0065-RCJ-VPC 11 12 Plaintiff, UNOPPOSED MOTION FOR PRETRIAL SERVICES TO 13 v. RETURN PASSPORT ALEJANDRO REYES-RAMIREZ, 14 Defendant. 15 16 The defendant, ALEJANDRO REYES-RAMIREZ, by and through his attorney of 17 18 record, Assistant Federal Public Defender Lauren Gorman, hereby moves this Honorable Court, 19 pursuant to Federal Rule of Criminal Procedure 47, Local Criminal Rule 47-1 and 18 U.S. C. § 20 3154 for Pretrial Services to return Mr. Reyes's passport. 21 Pretrial Services has indicated that it requires an Order to release the passport to Mr. 22 Reyes. Since Mr. Reyes is no longer being supervised by Pretrial Services, he requests that his 23 passport be returned in compliance with Pretrial Services' functions and powers described in 18 24 U.S. C. § 3154. Moreover, this Mexican passport is Mr. Reyes's only form of identification. He 25 needs to be able to provide legal identification in a variety of contexts including his efforts in 26 conjunction with his immigration attorney to obtain legal status in the United States.

This motion is not opposed by Assistant United States Attorney Carla Higginbotham or by Pretrial Services Officer Jennifer Simone.

DATED this 14th day of October 2016.

RENE L. VALLADARES Federal Public Defender

By: /s/ Lauren Gorman

LAUREN GORMAN Assistant Federal Public Defender Attorney for Alejandro Reyes-Ramirez

IT IS HEREBY ORDERED that the Unopposed Motion for Pretrial Services to Return Passport (ECF #56) is GRANTED.

IT IS FURTHER ORDERED that Pretrial Services shall release the passport to the U.S. Probation Office in Reno, Nevada.

IT IS SO ORDERED this 1st day of December, 2016.

ROBERT 4. JONES

## **CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on October 13, 2016, she served an electronic copy of the above and foregoing MOTION FOR PRETRIAL SERVICES TO RETURN PASSPORT by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN United States Attorney CARLA HIGGINBOTHAM Assistant United States Attorney 333 Las Vegas Blvd. So. 5th Floor Las Vegas, NV 89101

/s/ Bonnie S. Bell
Employee of the Federal Public Defender